

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

QBE INSURANCE CORPORATION,)
Plaintiff,) Civil Action No. 1:10-cv-05693-LAK
-against-)
WOODLANDS EXPORT LLC and)
DF DEUTSCHE FORFAIT AG)
Defendant.)
X

**STIPULATION OF VOLUNTARY DISMISSAL
AND ORDER PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)**

IT IS HEREBY STIPULATED AND AGREED by and between the parties and their
respective counsel that:

1. The above-captioned action is voluntarily dismissed without prejudice
against the defendants Woodlands Export LLC ("Woodlands") and DF
Deutsche Forfait AG ("DF"), pursuant to Federal Rule of Civil Procedure
41(a)(1)(A)(ii); and
2. Any past, present or future dispute, controversy or claim between the
parties to this litigation which arises out of, relates to, or is in connection
with QBE Trade Credit Insurance Policy No. DC/8800212/AE (the "Policy,"
attached as Ex. A), including the claim that is the subject of this action,
shall be subject to the exclusive jurisdiction of the United States District
Court for the Southern District of New York.

3. Nothing herein shall otherwise modify or affect any of the parties' rights and obligations under the Policy.

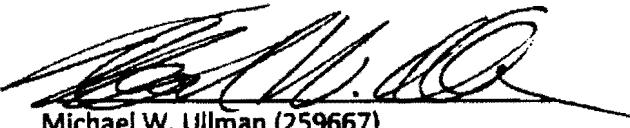
4. This So Ordered Stipulation embodies the entire agreement of the parties in this matter.

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Attorneys for Defendants Woodlands Export LLC and DF Deutsche Forfait AG

SO ORDERED:


The Honorable Lewis A. Kaplan,
United States District Judge

Dated: 12/23, 2010
New York, New York


BC